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7 Attorney for Defendant Max Joseph Plog-Horowitz

8 **United States District Court**
9 **Northern District of California**
10 **Oakland Division**

11 UNITED STATES OF AMERICA,

12 *Plaintiff,*

13 vs.

14 MAX JOSEPH PLOG-HOROWITZ,

15 *Defendant.*

Case No. 4:12-cr-00661-CW-1

STIPULATION PERMITTING TRAVEL

16
17 **STIPULATION PERMITTING TRAVEL**

18 Mr. Plog-Horowitz' wife, Maria Stevenson, has recently been diagnosed with keratoconus,
19 a progressive disease which makes it difficult for her to see, drive and operate without assistance.
20 She had an ophthalmic evaluation and fitting on March 7, 2013 and is awaiting the delivery of
21 special contact lenses which will allow her to safely manage these daily tasks without assistance.

22 Mr. Plog-Horowitz respectfully requests to be allowed to travel to Little Rock, Arkansas from
23 Wednesday, March 13, 2013 to Sunday, March 24, 2013 to aid his wife until she receives her
24 corrective lenses and is no longer functionally impaired.

25 The conditions of Mr. Plog-Horowitz' release do not currently allow him to travel outside
26 of the Northern District of California.

27 Accordingly, the parties agree and stipulate that Mr. Plog-Horowitz' release conditions shall

1 be modified to permit him to travel outside of the Northern District of California to Little Rock,
2 Arkansas from Wednesday, March 13, 2013 through Sunday, March 24, 2013 to aid his wife Maria
3 Stevenson.

4
5 IT IS SO STIPULATED.

6
7 March 11, 2013

8 Date

/s/ ACB

ANNE C. BELES,
Attorney for *Defendant*

9
10 March 11, 2013

11 Date

/s/ JCM

JAMES C. MANN,
Assistant U.S. Attorney

12
13 March 11, 2013

14 Date

/s/ VG

VICTORIA GIBSON,
U.S. Pretrial Services

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United States District Court
Northern District of California
Oakland Division

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MAX JOSEPH PLOG-HOROWITZ,

Defendant.

Case No. 4:12-cr-00661-CW-1

~~[PROPOSED]~~ ORDER PERMITTING TRAVEL

ORDER PERMITTING TRAVEL

The Court has read and considered the Stipulation to Modify Conditions of Release as to Defendant Plog-Horowitz, filed by counsel for the United States of America and defendant Max Joseph Plog-Horowitz in this matter on Monday, March 11, 2013. The Court hereby finds that the Stipulation, which this Court incorporates by reference into this Order, provides good cause to allow for a modification of defendant's Conditions of Release to permit travel outside of the Northern District of California to Little Rock, Arkansas to aid his wife Maria Stevenson.

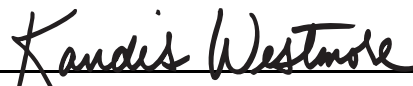
THEREFORE, FOR GOOD CAUSE SHOWN:

The Court orders that defendant's release conditions shall be modified to permit him to travel to Little Rock, Arkansas, from Wednesday, March 13, 2013 through Sunday, March 24, 2013. All other conditions of release shall remain in effect.

IT IS SO ORDERED.

3/12/13

Date


Honorable Kandis A. Westmore
United States Magistrate Judge
Northern District of California